

USEPA/OECA/OC
State and Tribal Assistance Grant (STAG) FY2003
New Jersey: Regulated Underground Storage Tank Facility Inspector Training
Proposal
Uploaded to the Internet 6/7/04

I. Project Information:

State/Tribe Department: New Jersey Department of Environmental Protection

Title of Project: Regulated Underground Storage Tank Facility Inspector Training

Focus Area: Environmental Enforcement Training

Total Funds Requested from EPA: \$50,000

Total Project Costs: \$58,640

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Preferred Assistance Agreement: Environmental Compliance Grant

II. Summary

The New Jersey Department of Environmental Protection (NJDEP) is in the process of developing an inspection program to address the issue of operational compliance at regulated Underground Storage Tank (UST) facilities. The problem being targeted is an unacceptable level of operational non-compliance at regulated Underground Storage Tank (UST) facilities, particularly retail fuel establishments. The goal of the NJDEP is to reduce that level of non-compliance by creating a dedicated group of UST inspectors in the NJDEP's Division of Compliance & Enforcement and at the county level. To do so the NJDEP shall establish a training program that will support three objectives; 1) Provide initial training of state inspectors for regulated UST inspections, 2) Provide initial training of county inspectors who are inspecting regulated UST facilities as a result of agreements with the NJDEP pursuant to the County Environmental Health Act, and, 3) Design and implement a continuing education element that will result in enhanced training on a quarterly basis for both state and county inspectors. The initial training will be beginner-level UST inspector training. The continuing education element is intended to allow more in-depth training as well as intermediate and advanced level training.

Project components consist of a multi-day (4 total) training event in both the classroom and the field combined with quarterly continuing education to increase the number of state and county inspectors available to perform inspections. Field training will include site visits to regulated facilities. The continuing education component is targeted to address the continual changes impacting both the regulated community and the regulators and to attract greater participation by our county partners.

The training of additional inspectors will increase the number of inspections being performed. The creation of a dedicated NJDEP inspection force and the results of their inspections will be released on the NJDEP website and in the media in an effort to promote operational compliance and to highlight the resultant costs of non-compliance. Traditional enforcement actions shall result from significant non-compliance by UST owner/operators and establish return to compliance pathways. As mentioned above, some resultant enforcement actions will also be publicized in order to maximize their deterrence value and promote operational compliance.

Summary of Project Goals

- Develop an inspector training program
- Provide beginner-level inspector training
- Train up to 35 state, county and local government employees
- Provide continuing education

Summary of project components

- *Development of training materials*
- *Organize and conduct meeting(s) with interested county environmental health agencies and other state government agencies to prepare for training*
- *Conduct training workshops*

Summary of how the project components will address the problem & attain goals
The project components are designed to develop inspector training materials and to conduct inspector training that will determine operational compliance in accordance with N.J.A.C. 7:14B-1 et seq.

III. Work Plan

Proposed Activities

1. Development and reproduction of training materials and workshop preparation
The NJDEP has a pre-existing training manual known as the Compliance Inspection Guide (the Guide). Inspector training will revolve around materials in NJDEP's Compliance Inspection Guide (the Guide). A copy of the Guide will be provided to each trainee. Each guide is a graphic training manual written by inspectors for inspectors and shall be complemented by additional training including a description of the current legal framework and enforcement procedures to be utilized. The guide includes color photographs and will be made available to each participant in graphic and CD-ROM

formats. Equipment vendors and certified contractors will be invited to participate and demonstrate equipment commonly found at UST facilities. Experts from other states and tribes will be invited as guest instructors at the continuing education components to make focused presentations in their area of expertise.

Locations off-site from NJDEP's main campus in Trenton, N.J. will be sought for workshop presentations. Possible locations include the three Water Compliance & Enforcement offices (Parsippany, Hamilton Twp. and Camden), any of the state or community colleges, or any other state meeting facilities found throughout New Jersey.

2. Recruitment and selection of county & other state agency participants

In the year 2003 12 out of 21 counties in N.J. performed UST inspections pursuant to the County Environmental Health Act (CEHA). As part of the planning process for calendar year 2004 a meeting will be held for representatives of the county health departments and other interested state agencies to describe the training workshops and recruit participation.

3. Implementation of training workshops

This training program shall consist of two cycles. Each cycle shall take one full year. Each cycle shall consist of two consecutive weeks of instruction, each week consisting of two consecutive days of training, the first day in the classroom; the second day in the field at regulated facilities. Each cycle will also include 4 quarterly continuing education workshops. The NJDEP will maintain flexibility to adapt the curriculum of the second cycle to match the experience and needs of the training candidates in that cycle.

Initial participation is capped at up to 35 state and county inspectors. There will be no travel and lodging costs associated with this training program for New Jersey based trainees. For a general course outline see the attached copy of the Table of Contents from the Guide. The workshops will stress an understanding of New Jersey's UST rules, N.J.A.C. 7:14B-1 et seq. The course material will be consistent with EPA's Federal Guidelines and is therefore supportive of an authorized program, should New Jersey choose to pursue authorization.

A unique element of this training effort will be the introduction of cross training in the area of air pollution control, specifically Stage I and II Vapor Recovery compliance. Additional cross-training areas shall include but not be limited to solid and hazardous waste enforcement and criminal investigation training. Compliance emphasis at UST facilities shall focus on release detection monitoring, overfill prevention, spill prevention, corrosion protection, corrective actions and related records maintenance.

An additional critical component will be the establishment of continuing education quarterly training workshops regarding UST operational compliance issues, cross-media inspection issues, compliance assistance, enforcement procedures and tools, inter-agency cooperative efforts and other relevant topics. This continuing education feature is also

intended as an added incentive for county participation and participation by other state agencies.

Output and Outcome Measures:

The intended result and measure of success will be:

- Development of workshop curriculum, training manual and related materials
- Attendance and participation at workshops by state and county representatives
- Survey of knowledge before and after training workshops
- Requests for training manual
- Requests for additional training workshops
- Increased number of UST operational compliance inspections in New Jersey

Sharing Results

NJDEP will make its inspector training program, training classes and materials available to other interested New Jersey state agencies, other states and tribes. NJDEP expects interest by other New Jersey state agencies such as the New Jersey Highway Authority, New Jersey Transit and New Jersey Department of Transportation. Copies of the Guide will be made available on CD and the NJDEP website. Semi-annual and final project reports shall also be submitted to EPA to evaluate progress and accomplishments and to guide improvements to the delivery of future training workshops.

IV. Project Milestones:

1. September 2003 – Notification of Grant Award
2. December 15, 2003 – Submit Application and Work Plan to EPA
3. January 2004 – Conduct recruitment meeting with counties and other state agencies
4. February 2004 – Select training workshop participants
5. March 2004 – Conduct initial 4 days of inspector training workshops
6. May 2004 - Conduct first quarterly continuing education training (1day)
7. August 2004 - Conduct second quarterly continuing education training (1day)
8. August 31, 2004 – Submit 1st semi-annual progress report to EPA
9. November 2004 - Conduct third quarterly continuing education training (1day)
10. February 2005 - Conduct fourth quarterly continuing education training (1day)
11. February 2005 - Submit 2nd semi-annual progress report to EPA
12. February 2005 - Select training workshop participants for second cycle of workshops
13. March 2005 - March 2004 – Conduct 4 days of inspector training workshops
14. May 2005 - Conduct fifth quarterly continuing education training (1day)
15. August 2005 - Conduct sixth quarterly continuing education training (1day)
16. August 31, 2005 – Submit 3rd semi-annual progress report to EPA
17. November 2005 - Conduct seventh quarterly continuing education training (1day)
18. February 2006 - Conduct eighth quarterly continuing education training (1day)
19. February 28, 2006 – Submit final (4th) progress report to EPA

Total Project duration: 2 years

These milestones are subject to change based upon the actual date that grant monies are received by NJDEP.

V. Project Costs

- Graphic Reproduction of NJDEP's UST Compliance Inspection Guide
150 copies @ \$60 per copy = \$9,000
- Reproduction of NJDEP's UST Compliance Inspection Guide onto CD-ROM
100 copies @ \$1 per copy = \$100.
- Continental Breakfast
16 days @ \$300 per day = \$4,800
- Travel Expenses for Guest Lecturers
16 Guest days @ \$1,000. Per Guest = \$16,000.
- Federal Per Diem Rates for Princeton/Trenton, Max. Lodging plus meals per day = \$185
16 Guest days @ \$185 per day = \$2,960.
- Offsite Training Facility
8 days @ \$1,000 per day = \$8,000
- Travel Expenses for Participants from out of state
Travel, lodging, per diem = \$9,140

Total EPA costs \$50,000

- NJDEP Staff Time/Resources for presentation of training course
Preparation/Modification of course materials, audio-visual needs, hospitality, transportation, etc.

Total DEP costs \$8,640

ATTACHMENT I

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